

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FREE SPEECH COALITION, INC., et al.,

Plaintiffs,

v.

ANGELA COLMENERO, In Her Official
Capacity As Interim Attorney General For
The State Of Texas

Defendant.

CASE NO. 1:23-cv-00917-DAE

**JOINT STIPULATION REGARDING PLAINTIFFS' APPLICATION FOR COSTS AND
FEES**

WHEREAS, Local Rule CV-54(b) provides that “a claim for fees shall be made by motion in accordance with paragraph (b)(2) not later than 14 days after entry of judgment pursuant to Federal Rule of Civil Procedure 54. A motion for award of attorney’s fees filed beyond the 14-day period may be deemed untimely and a waiver of entitlement to fees.”

WHEREAS, Federal Rule of Civil Procedure 54(a) defines a “judgment” as “any order from which an appeal lies,” including an order of preliminary relief.

WHEREAS, the parties have met, conferred, and agreed—without conceding that any sum is or will be owed to Plaintiffs or that Plaintiffs are legally entitled to such an award against Defendant in any event—that it would be wasteful potentially to engage in any unnecessary motion practice or other dispute over costs and fees at this preliminary stage, particularly as subsequent developments may bear upon the parties’ respective positions.

WHEREAS, out of an abundance of caution and for the sake of obviating any procedural dispute or uncertainty, the parties therefore STIPULATE as follows:

Pursuant to Local Rule CV-54, Plaintiffs' Application for Costs and Fees, inclusive of those related to this Court's Order of preliminary relief (Dkt. #36), shall be due 14 days after entry of final judgment unless another date is mutually agreed upon by the parties in writing.

DATED: September 14, 2023

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By */s/ Scott Cole*

Scott Cole

Attorney for Plaintiffs

DATED: September 14, 2023

OFFICE OF THE TEXAS ATTORNEY GENERAL

By /s/ John Ramsey

John Ramsey

Assistant Attorney General

Attorney for Defendant